MARPOL Annex VI Regulation 18.2, as incorporated by reference in 40 C.F.R. § 1043.100, provides that a vessel not in compliance with the fuel oil sulfur standards will:

- "(1) present a record of the actions taken to attempt to achieve compliance; and
- (2) provide evidence that it attempted to purchase compliant fuel oil in accordance with its voyage plan and, if it was not made available where planned, that attempts were made to locate alternative sources for such fuel oil and that despite best efforts to obtain compliant fuel oil, no such fuel oil was made available for purchase."

Vessel's Name: Vessel's Flag: Identification Number: (IMO or other)

Voyage Plan

Port of Origin:
Port of Destination:
First U.S. Port of Arrival:

List of all port visits beginning with the Port of Origin and ending at Port of Destination:

1. Port of Origin:
2nd Port Visit:
3rd Port Visit:
4th Port Visit:
5th Port Visit:
6th Port Visit:
7th Port Visit:
8th Port Visit:
9th Port Visit:

(Insert more as needed)

Date and Time Vessel Received Notice it would transit the NA-ECA:

Location of Vessel when notice was received it would transit the NA-ECA:

Date and Time vessel is expected to enter the NA-ECA:

Date and Time vessel is expected to exit the NA-ECA:

Projected number of days the main propulsion engines will be operated in the NA-ECA:

Sulfur Content of Fuel Oil used when entering the NA-ECA: Sulfur Content of Fuel Oil used while operating in the NA-ECA:

A description of the <u>actions taken</u> to attempt to achieve compliance prior to entering the North American ECA, <u>including a c description of the reason</u> why compliant fuel oil was not available (e.g., compliant fuel oil was not available at ports on "inte Note: The United States government does not consider the cost of compliant fuel oil to be a valid basis for claiming the non the dates on which the contact was made.

Text Here:Subject vessel was aquired from previous owners on the 9th of October 2014. At theb time of delivery t6he Mod immediately proceeded with all the actions in order the Class approval for the operating of the vessel at Low Sulphur <0.1% -Purchased of pending equipment.

- -Obtain Class approval for the installation of all equipment of piping/pumps.
- -Dispatch our team onboard for installation of above equipment.

The installation was completed in December 2014 and service vengineer was requested for attending at vessel's waiting an advised that attendance can be done prior to the begining of January 2015.

In view of the above we kindly request for a 10 days grace period to be provided which will allow us to test and certify the s

In cases of fuel oil supply disruption, the name of the port at which the vessel was scheduled to receive compliant fuel oil oil.
Enter Text Here: THIS SECTION IS NOT APPLICABLE TO OUR CASE, AS VESSEL HAS SUFFICIENT LOW SULPHUR < 0.1% ON BOA MODIFICATION.
PLEASE REFER TO NEXT SECTION.
If applicable, identify and describe any operational constraints that prevented you from using available compliant fuel oil, fo are taking, to resolve these operational constraints that will allow you to use all commercially available residual fuel oil blen
Enter Text Here: PLEASE NOTE FOLLOWING CLARIFICATION:
THE VESSEL HAS ONBOARD SUFFICIENT QUANTITY OF THE APPROPRIATE LOW SULHUR MGO OF $<01\%$. HOWEVER, SHE CAIPLEASE NOTE THAT VESSEL WILL BE IF FULL COMPLIANCE WHEN TRADING WITHIN THE NA-ECAZONE. THE ONLY PROBLEM
TO DISCHARGE THE CARGO AT THE PORT OF DESINATION (TEXAS CITY OR HOUSTON-TO BE CONFIRMED) PRIOR TO COMPLE STEPS TAKEN:
PLEASE REFER TO SECTION (1). ALSO PLEASE NOTE THAT TECHNICIANS FROM DENMARK OF BOILERS MAKERS, HAVE ALREAD DURATION OF MODIFICATION IS ABOUT 3 DAYS. CLASS SURVEYOR IS ALSO ARRANGED FOR CERTIFICATION OF COMPLIANCE.
ed as some remarked from eliminarmon or comit limine.

If applicable, identify and describe any operational constraints that prevented you from using available compliant fuel oil, fo are taking, to resolve these operational constraints that will allow you to use all commercially available residual fuel oil blender.
Enter Text Here:PLEASE NOTE FOLLOWING CLARIFICATION: THE VESSEL HAS ONBOARD SUFFICIENT QUANTITY OF THE APPROPRIATE LOW SULHUR MGO OF <01%. HOWEVER, SHE CAI PLEASE NOTE THAT VESSEL WILL BE IF FULL COMPLIANCE WHEN TRADING WITHIN THE NA-ECA ZONE. THE ONLY PROBLEM TO DISCHARGE THE CARGO AT THE PORT OF DESINATION (TEXAS CITY OR HOUSTON-TO BE CONFIRMED) PRIOR TO COMPLE STEPS TAKEN: PLEASE REFER TO SECTION (1). ALSO PLEASE NOTE THAT TECHNICIANS FROM DENMARK OF BOILERS MAKERS, HAVE ALREADED TO SECTION (2).
DURATION OF MODIFICATION IS ABOUT 3 DAYS. CLASS SURVEYOR IS ALSO ARRANGED FOR CERTIFICATION OF COMPLIANCE.
Describe the availability of compliant fuel oil at the first port-of-call in the United States, and your plans to obtain that fuel o
Enter Text Here: THIS SECTION IS NOT APPLICABLE TO THIUS CASE AS VESSEL HAS ALREADY SUIFFICIENT LOW SULPHUR 0.19

If compliant fuel oil is not available at the first port-of-call in the United States, <u>describe</u> the lowest sulfur content of available States.

Enter Text Here:

DUE TO BOILER MODIFICATION DELAY, PLEASE NOTE THAT VESSEL WILL CONSUME FOLLOWING GRADES FROM ENTERING NA-ECA ZONE (JAN.12,2015) UNTILL COMPLETION OF DISCHARGE AT TEXAS CITY (JANUARY 16,2015):

- 1.) LOW SULPHUR GASOIL OF <0.1% FOR MAIN ENGINES WHEN NAVIGATING THE NA-ECA ZONE.
- 2.) LOW SULHUR FUEL OIL OF <1%, FOR DISCHARGE ONLY AT TEXAS CITY OR HOUSTON.

If the vessel has operated in the North American ECA in the prior 12 months, provide the names of all U.S. ports visited, the

Enter Text Here:

SAOUTH SABINE DELIVERY OCT.10,2014
GALVESTON-TRANSHIPMENT AREA OCT.15-16, 2014 - LOAD
PORT NECHES OCT.17-29, 2014 - DISCHARGE.

HOUSTON NOV.23-27.2014 - DISCHARGE

GALVESTON ANCHORAGE NOV.27-DEC.4,2014 - BOILERS MODIFICATIONS.

TEXAS CITY ETA JAN.13 - 16, 2015 - DISCHARGE.

DURING ALL ABOVE PERIOD VESSEL WAS BURNING THE APPROPRIATE LOW SULPHUR FUEL OIL OF <1%.

If the vessel or owner/operator has submitted a F and provide details on the dates and ports previo			 ernment in the p	re
Enter Text Here: NO. THIS IS THE FIRST TIME.				

<u>Provide</u> all relevant contact information, including the ship master, ship operator, legal agent in the United States, ship own authorized to answer additional questions relating to claims of fuel oil unavailability and his or her full contact information.

Enter Text Here:

SHIP OLYMPIC SEA - IMO NR.:9489285

OPEARTORS SPRINGFIELD SHIPPING CO.PANAMA SA

(BRANCH IN GREECE) TEL.: 0030 210 9498201 FAX::0030 210 9498188

EM: OPERATION@OLYSHIP.COM

AGENTS MARITIME ENDEAVORS SHIPPING - HOUSTON

e-mail: OPS-TEXAS@MESCLTD.COM

Fuel Oil Non-Availability Report

North American Emmissions Control Area (NA-ECA)

OLYMPIC SEA GREEK 9489285

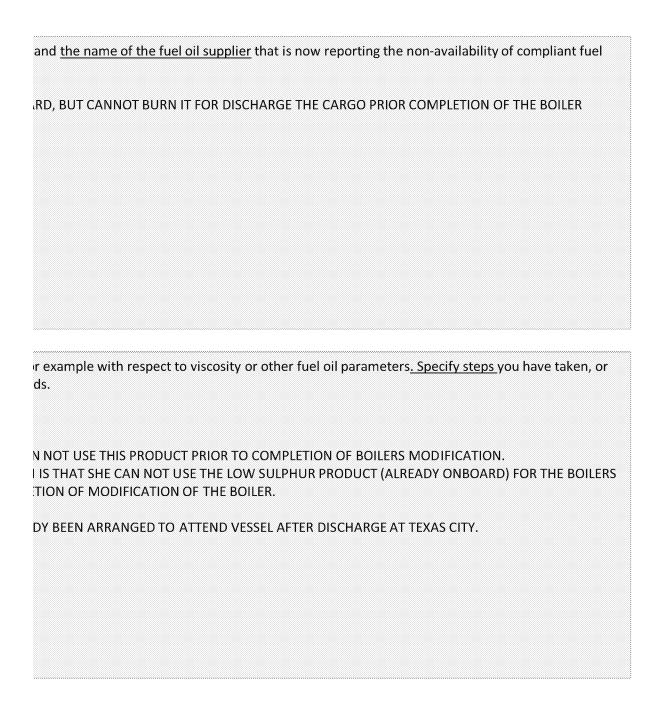
(Note: This plan should reflect what is in effect at the time of the vessel's entry into the North American ECA)

CAYO ARCAS/EAST COAST MEXICO
TEXAS CITY,TXS
TEXAS CITY,TXS

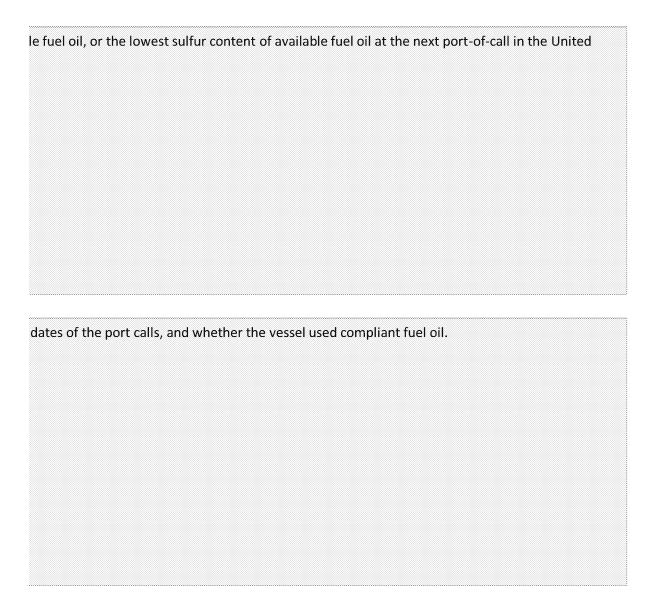
GALVESTON ANCHORAGE
CAYO ARCAS
TEXAS CITY

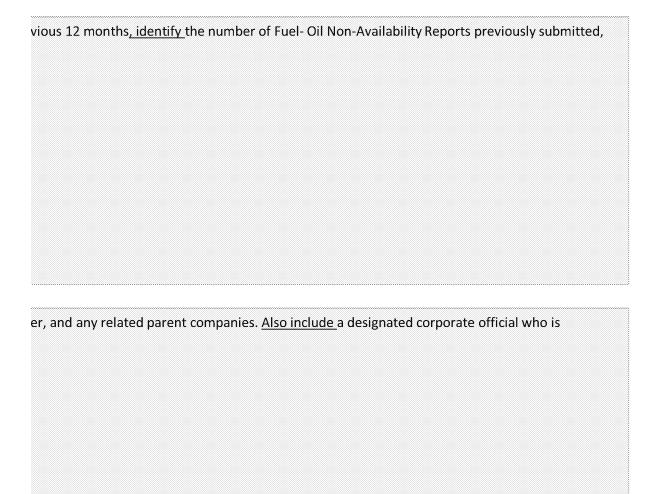
	GALVESTON LIGHTERING AREA
	13-Jan-15
	15-Jan-15
	2
	0.01%
	0.01%
<u>escription</u> of all attempts that were made to locate alt nded voyage;" fuel oil supply disruptions at port; etc.	
evailability of compliant fuel oil). Include names and a	
fication of the Boiler for burning low sulphir (0.1%) m soonest possible but in any case before the vend od D	
	December 2014. Actions taken:
soonest possible but in any case before the vend od D	December 2014. Actions taken:
soonest possible but in any case before the vend od E chorage on 18th of December 2014, Unfirtunately and	December 2014. Actions taken:
soonest possible but in any case before the vend od E chorage on 18th of December 2014, Unfirtunately and	December 2014. Actions taken:
soonest possible but in any case before the vend od E chorage on 18th of December 2014, Unfirtunately and	December 2014. Actions taken:
soonest possible but in any case before the vend od E chorage on 18th of December 2014, Unfirtunately and	December 2014. Actions taken:
soonest possible but in any case before the vend od E chorage on 18th of December 2014, Unfirtunately and	December 2014. Actions taken:

3-Jan-15

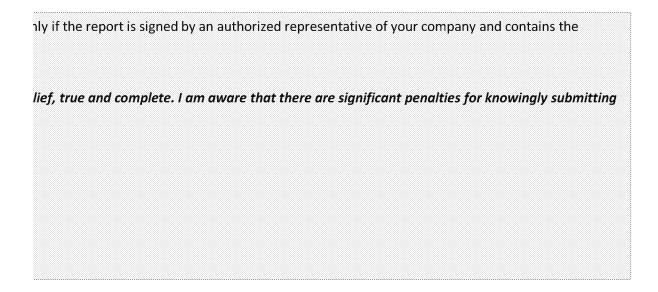


r example with respect to viscosity or other fuel oil parameters <u>. Specify steps</u> you have taken, or ds.
N NOT USE THIS PRODUCT PRIOR TO COMPLETION OF BOILERS MODIFICATION. I IS THAT SHE CAN NOT USE THE LOW SULPHUR PRODUCT (ALREADY ONBOARD) FOR THE BOILERS TION OF MODIFICATION OF THE BOILER.
DY BEEN ARRANGED TO ATTEND VESSEL AFTER DISCHARGE AT TEXAS CITY.
oil.
6 QUANTITY ONBOARD TO MCOMPLETE THE VOYAGE .





in are, to the best of my knowledge and b nment pursuant to 18 U.S.C. § 1001."
1. In the United States by email to



marine-eca@epa.gov